

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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TUCKER LAMB and JUSTINE RICHARDS,  
in their individual capacities and on behalf of  
others similarly situated,

Plaintiffs,

**Affidavit of Harendra Singh**

- against -

SINGH HOSPITALITY GROUP, INC.; HARENDRA  
SINGH, an individual; RAJ & RAJ REALTY, LTD.,  
d/b/a H.R. Singleton's or Singleton's; SRB  
CONCESSION INC., d/b/a Singleton's Seafood  
Shack; Quinn Restaurant Corp. d/b/a Water's  
Edge; S.R.B. Convention & Catering Corp d/b/a  
The Woodlands; H&R Concessions Inc. d/b/a Poco  
Loco; BRS Restaurant Inc.; f/d/b/a Thom Thom's  
Steak & Seafood; and RBS Restaurants Inc. f/d/b/a  
Ruby's Famous BBQ Joint,

Defendants.

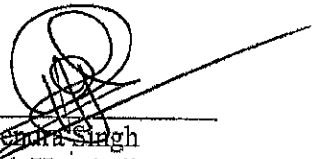
Index No.: 2:11-cv-6060 MKB-ARL

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STATE OF NEW YORK }  
COUNTY OF NASSAU }

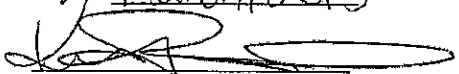
Harendra Singh, being duly sworn deposes and states:

1. I am the sole shareholder of Singh Hospitality Group.
2. Each restaurant listed below is separate and distinct from each other and operates as its own restaurant.
3. Singh Hospitality Group currently reports the financials of the following restaurants:
  - a. The Woodlands
  - b. The Woodlands at the Greens
  - c. Water's Edge
  - d. HR Singleton's
  - e. Poco Loco
  - f. Feuego Picante
  - g. Singleton's Salsa Shack
  - h. Singleton's Seafood Shack
4. Singh Hospitality has in the past been affiliated with:
  - a. Long Fin Seafood Restaurant

- b. Thom Thom's Steak & Seafood
  - c. Ruby's Famous BBQ Joint
  - d. The Delano Mansion
5. I, nor Singh Hospitality Group, has ever been affiliated with Roslyn Fish Co.
6. Each has its own separate corporation, separate general manager, separate staff and separate policies.
7. Each restaurant has servers, cooks, cashiers, dishwashers, bussers, expeditors, hosts/hostesses and bartenders.
8. Each restaurant has different hours, schedules, duties and supervisors.
9. The positions at some restaurants are different than the positions at others.
10. Upon information and belief, on March 7, 2011 Tucker Lamb failed to punch out causing the over 11 hour Close Report. He did not work those hours. As per H. R. Singleton's policy and as permitted by law, Michael Lansberg changed Plaintiff Tucker Lamb's pay record to reflect actual hours he worked that day. This is the company policy and a legitimate reason for the discrepancy.

  
Harender Singh  
Singh Hospitality Group, Inc.

Sworn to before me this 11  
day of March, 2013

  
Notary Public

**Kristina Pennisi**  
Notary Public, State of New York  
No. 01PE6128170  
Qualified in Nassau County  
Commission Expires June 6, 2013